

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KENNETH T. VAIL,

Plaintiff

v.

HARLEYSVILLE GROUP, INC.

Defendant

NO. 02-CV-2933

**PLAINTIFF KENNETH T. VAIL'S RESPONSE TO DEFENDANT'S  
STATEMENT OF UNDISPUTED FACTS**

1. Admitted.
2. Admitted.
3. It is admitted that there is an Employee Manual. It is unknown if a copy is provided to all incoming employees.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Denied as stated. The document speaks for itself.
9. Admitted.
10. Admitted.
11. Admitted.
12. Admitted.
13. Admitted.

14. Admitted.
15. Admitted.
16. Admitted.
17. Admitted.
18. Admitted.
19. Admitted.
20. Denied as stated.
21. Admitted.
22. Admitted.
23. Admitted.
24. Denied.
25. Denied.
26. Denied.
27. Denied.
28. Denied.
29. It is admitted that there were criticisms of performance after Plaintiff's injury.
30. Admitted.
31. Admitted.
32. Denied as stated.
33. Admitted.
34. Admitted.
35. Admitted.
36. Admitted.

- 37. Denied as stated.
- 38. Denied as stated.
- 39. Admitted.
- 40. It is not known if sick leave or vacation leave had been accumulated, and therefore the averment is denied.
- 41. Denied.
- 42. Admitted.
- 43. Admitted.
- 44. Denied.
- 45. Admitted.
- 46. Denied.
- 47. Admitted.
- 48. Admitted.
- 49. Admitted.
- 50. Denied as stated.
- 51. Admitted.
- 52. Admitted.
- 53. Denied.
- 54. Admitted.
- 55. Admitted.
- 56. Admitted.
- 57. Denied.
- 58. Admitted.
- 59. Admitted.

- 60. Admitted.
- 61. Denied as stated.
- 62. Denied as stated.
- 63. Admitted.
- 64. Admitted.
- 65. Denied as stated.
- 66. Admitted.
- 67. Admitted.
- 68. Denied.
- 69. Admitted.
- 70. Denied as stated. The documents speak for themselves.
- 71. Denied as stated. The documents speak for themselves.
- 72. Admitted.
- 73. Admitted.
- 74. Admitted.
- 75. Denied as stated.
- 76. Admitted.
- 77. Admitted.
- 78. Admitted.
- 79. Admitted.
- 80. Admitted.
- 81. Admitted.
- 82. Admitted.

- 83. Denied as stated.
- 84. Admitted.
- 85. Admitted.
- 86. Denied.
- 87. Admitted.
- 88. Denied.
- 89. Denied.
- 90. Denied.
- 91. Denied.
- 92. Denied.
- 93. Admitted.
- 94. Denied.
- 95. Admitted.
- 96. Admitted.
- 97. Admitted.
- 98. Admitted.
- 99. Denied as stated.
- 100. Denied.
- 101. Admitted.
- 102. Denied.
- 103. Denied.
- 104. Denied.
- 105. It is admitted that Plaintiff received a severance package.

106. Denied.

107. Denied as stated.

108. Denied.

109. Admitted.

110. Admitted.

111. Admitted.

112. Admitted.

113. Admitted.

114. Admitted.

115. Admitted.

116. Admitted.

117. Admitted.

118. Admitted.

119. Admitted.

120. Admitted.

121. Denied as stated. The document speaks for itself.

122. Admitted.

123. Admitted.

124. Admitted.

125. Admitted.

126. Admitted.

127. Admitted.

128. Admitted.

- 129. Admitted.
- 130. Denied.
- 131. Admitted.
- 132. Admitted.
- 133. Denied.
- 134. Admitted.
- 135. Admitted.
- 136. Admitted.
- 137. Admitted.
- 138. Admitted.
- 139. Admitted.
- 140. Admitted.
- 141. Admitted.
- 142. Denied as stated.
- 143. Denied as stated.
- 144. Denied as stated.
- 145. Admitted.
- 146. Denied as stated.
- 147. Admitted.
- 148. Admitted.
- 149. Denied as stated.
- 150. Admitted.

Respectfully submitted,

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